

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

MARGARET MADDOX,)
)
Plaintiff,)
)
v.) CIVIL ACTION FILE
) NO: 11C-05251-6
WAL-MART STORES, INC.,)
CINDY FOX and DAVID ARRANT,)
)
Defendants.)

PLAINTIFF'S RESPONSE TO DEFENDANTS'
FIRST REQUEST FOR ADMISSIONS OF FACT TO PLAINTIFF

Comes now, Margaret Maddox, Plaintiff herein, and responds to the Defendants'

First Request for Admissions of Fact to Plaintiff as follow:

1.

Plaintiff will not seek, recover or collect from Defendants a sum in excess of \$75,000.

RESPONSE:

Denies same.

2.

Any portion of a verdict against Defendants that exceeds \$75,000 will be written down by the Court so that the Judgment shall not exceed the sum of \$75,000.

RESPONSE:

Plaintiff denies same.




3.

Defendants shall not in this action be ordered, adjudged or called upon to pay to Plaintiff
a sum in excess of \$75,000.

RESPONSE:

Plaintiff denies same.



JOHN M. HYATT
Georgia Bar No. 381350
Attorney for Plaintiff


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Decatur, GA 30030
404/378-3635

CERTIFICATE OF SERVICE

This is to certify that I have served the within and foregoing **Plaintiff's Response to Defendants' First Request for Admissions of Fact to Plaintiff** upon all counsel of record by depositing a copy of same in the United States Mail with adequate postage affixed thereon addressed to:

Albert J. DeCusati
McLain & Merritt, P.C.
3445 Peachtree Road N.E.
Suite 500
Atlanta, GA 30326

This 29 day of July, 2011.



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